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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION

12 UNITED STATES OF AMERICA,	)	
13 Plaintiff,	)	Case No. CR 17-00164 JST
14 v.	)	STIPULATION AND <del>PROPOSED</del> ORDER
15 MARCUS L. JONES,	)	EXCLUDING TIME FROM MAY 5, 2017 TO JUNE
16 Defendant.	)	23, 2017
17	)	
18	)	

19 Plaintiff United States of America and defendant Marcus L. Jones, by and through their  
20 respective counsel of record, hereby stipulate as follows:

21 1. On May 5, 2017, the parties appeared before the Court for the first District Court  
22 appearance in this case. Pursuant to the parties' request, the Court set the matter for a further status  
23 hearing on June 23, 2017.

24 2. The parties jointly stipulated to exclude the time between May 5, 2017, and June 23,  
25 2017, from the time in which the defendant must be brought to trial pursuant to the Speedy Trial Act, 18  
26 U.S.C. § 3161 *et seq.* The government produced discovery in this case on May 5, 2017, and the defense  
27 requires time to review the discovery and discuss the case with Mr. Jones, as well as participate in  
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STIPULATION AND ~~PROPOSED~~ ORDER  
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1 potential plea negotiations with the government. Therefore, the parties agree that the time period from  
2 May 5, 2017, through June 23, 2017, inclusive, should be excluded pursuant to 18 U.S.C. §§  
3 3161(h)(7)(A) and (h)(7)(B)(iv) on the basis that the ends of justice served by the continuance outweigh  
4 the best interests of the public and defendant in a speedy trial, and failing to exclude this time would  
5 deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of  
6 due diligence.

7 IT IS SO STIPULATED.

8  
9 Dated: May 9, 2017

BRIAN J. STRETCH  
United States Attorney

10  
11 /s/ William J. Gullotta  
12 WILLIAM J. GULLOTTA  
13 Assistant United States Attorney


14 Dated: May 9, 2017

/s/ William A. Welch  
15 WILLIAM A. WELCH  
16 Attorney for Defendant Adam Abrams  
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**ORDER**

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time between from May 5, 2017, through June 23, 2017 would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from May 5, 2017, through June 23, 2017 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, **IT IS HEREBY ORDERED** that the matter is set before this Court on June 23, 2017 at 1:00 p.m. for a status hearing, and that the time from May 5, 2017, through June 23, 2017 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

DATED: May 11, 2017

  
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THE HONORABLE JON S. TIGAR  
United States District Judge